

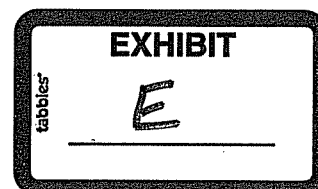
**AFFIDAVIT
OF
CHRISTOPHER J. SOKAL
10381 Lisbon Road
Canfield, Ohio 44406**

My name is Christopher J. Sokal and I was employed by Lexington Corporation in Vienna, Ohio from June, 1995 until September, 1998. When I left Lexington I was a quality engineer and acted as the assistant to Lorraine Cerimele, who was my boss.

My responsibilities included implementing a quality management system (QS9000) developed by the automotive industry which I adapted for company compliance with those standards. I also did corrective action for the company, took complaints from customers, and coordinated with technical people to find and solve problems. I restructured the calibration system as part of QS9000 and correlated with the supervisor for resource and departmental planning. I also ran the critical parts team to improve quality and effect cost production of Lexington. I also oversaw audits and ran internal audit programs to make sure the copy was in compliance with QS9000.

Keith Blockinger was president of the company and on various occasions I observed Blockinger standing outside Lorraine Cerimele's door to eavesdrop on meetings, phone conversations or conversations with individuals. On such occasions he did not make himself visible to Lorraine but would stand around the corner so that she was unable to observe him.

The company had many tooling issues and on various occasions Blockinger would override Lorraine Cerimele and go against the QS9000 standards. The QS9000 program called for a management review system which was suppose to be performed, documented, supported and driven by



the president who is to be audited by an outside auditor (third party registrar). The third party registrar works for an outside firm to certify and audit the corporation per QS9000 guidelines. The audit is to take place twice a year. Blockinger's section was part of the audit that was to take place. In the majority of audits Keith Blockinger would disappear and the auditor would instead audit Lorraine Cerimele. If Lorraine Cerimele did not act for Blockinger Lexington Corporation could lose its certification. The auditor remarked that it was obvious that Lorraine Cerimele and I were on our own and that the president Keith Blockinger was not supporting us.

Keith Blockinger was the only person in the company who could override quality control. He would do this frequently. Examples are as follows:

- Tooling issues mold #3364 we were told to ship by Blockinger.
- Tooling and process issue #3144 (broken feet), we were told to ship by Blockinger.
- Tooling issue #3173 (splitting on the side), we were told to ship by Blockinger.
- Manufacturing issue #12129909 we were told by Blockinger to ship even though it was defective.

These instances of defective tools and product where Blockinger would order shipment or approval occurred almost daily. Many customers were not aware that they had parts that were out of specification. As a rule we generally saw three PRR's a year, which was a lot, and other customers complaints were 15-20 a year. Between January 1, 1999 and the end of March, 1999 Lexington was getting 2-3 customer complaints a week and had 9 PRR's plus 2-3 complaints a week from other customers.

Lorraine Cerimele was an excellent quality control supervisor. She achieved the supplier of the year award 3 or 4 years in a row by General Motors Corp. During her employment at Lexington the direct product

acceptance rate was averaged at 87% to 95%. This means that it comes off the tool and out the door with no secondary inspection. From January, 1999 to June, 1999 the product went into a 100% inspection. The criteria for GM supplier of the year means that in order to be eligible your PPM has to be under 20 bad pieces per million. Lexington shipped 1.3 billion pieces. By the end of 1998 the PPM level was 5.

I overheard conversations between Keith Blockinger to Lorraine Cerimele regarding customers "we cannot tell them what happened--what are you going to tell them?" I heard Keith Blockinger say this to Lorraine at least 7 or 8 times. Blockinger also told me to support the situation and to support him as my boss.

I recall Blockinger in referring to meeting customer AMPS requirements stated "Fuck them, were not going to do it." He also made this statement regarding the customer ELCOM and CARDELL. I also heard him state to Lorraine regarding the customers "we're not doing that shit--do what you have to do."

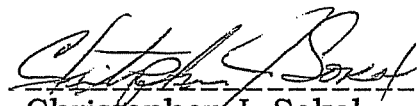
I believe Lorraine Cerimele was fired because the customer AMP made a threat to Lexington because of Blockinger's directions from Keith Blockinger and she became a scapegoat. Blockinger was looking for a way to get rid of her. He called her names behind her back, but in front of her heaped praises upon her.

The AMP customer made a statement that they would pull every single tool and that Lexington can keep its existing business but it would not get any additional tooling. The AMP customer gave Keith Blockinger the opportunity to fire Lorraine and promise AMP a better product.

Three months before I left Lexington Corporation Lorraine sensed that she would be fired and that the customer AMP was his opportunity to use her as a scapegoat.

I believe Lorraine Cerimele is what made the company, her efforts helped the company to achieve goals in spite of Blockinger's overriding of her high standards of product quality. When I heard she got fired I knew it was Blockinger's way to appease AMP by blaming it on Lorraine and firing her in order to portray that Lexington was correcting a problem when in fact the problem was due to Keith Blockinger's overriding Cerimele's decisions for good quality control.

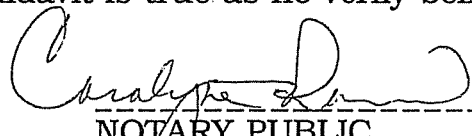
Lorraine Cerimele and other employees walked the line between doing a proper job for the customer and satisfying Blockinger's demands to ship inferior products. The employees in quality control had to save Blockinger from himself. It was obvious to me and others that the president was not neutral or supportive to quality control.



Christopher J. Sokal

STATE OF OHIO)
) ss.
TRUMBULL COUNTY)

Before me a notary public in and for the above state and county this 18th day of ^{October}~~August~~, 1999, personally appeared Christopher J. Sokal who on his oath did state that the foregoing affidavit is true as he verily believes.



NOTARY PUBLIC
Expiration
2-7-2003